

DEBORAH LAUFER, Individually,

Plaintiff,

VS.

Case No. 20-cv-01973-SAG

BRE/ESA P PORTFOLIO, LLC, A

Maryland Corporation,

Defendant.

MOTION OF DEFENDANT BRE/ESA P PORTFOLIO, LLC TO DISMISS

Defendant BRE/ESA P Portfolio, LLC ("**Defendant**") moves this Court for an Order dismissing the Complaint of Plaintiff Deborah Laufer ("**Plaintiff**") on the ground that Plaintiff lacks standing and the Court lacks subject matter jurisdiction to hear the case.

This Motion is based on the concurrently filed Memorandum of Points and Authorities and Request for Judicial Notice, as well as the pleadings and documents on file herein and other such evidence and argument that may be presented in connection with this Motion.

Dated: August 31, 2020

Respectfully submitted,

/s/ Michelle M. McGeogh

Michelle M. McGeogh

Fed. Bar No.: 28778

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LLC*

Pro Hac Vice Application to be filed

CERTIFICATE OF SERVICE

The undersigned hereby declares that on this 31st day of August, 2020, a true and accurate copy of the foregoing was served via the court's Electronic Case Filing system on all counsel of record.

/s/ Michelle M. McGeogh

Michelle M. McGeogh